

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
Please Choose Division**

LULAC

vs.  
Abbott

Case No.: 3:21-cv-259

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Frank H. Chang, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas pro hac vice to represent Movants, Texas House Members, in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of) Consovoy McCarthy PLLC with offices at:  
Mailing address: 1600 Wilson Blvd., Ste. 700  
City, State, Zip Code: Arlington, VA 22209  
Telephone: (703) 243-9423 Facsimile: \_\_\_\_\_
2. Since October 27, 2017, Applicant has been and presently is a member of and in good standing with the Bar of the State of Pennsylvania.  
Applicant's bar license number is 6324519.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>District of Columbia</u>	<u>9/1/2020</u>
<u>(see attached)</u>	_____
_____	_____

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):
5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:  
  
Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
  
6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:
7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):
8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: J. Michael Connolly

Mailing address: Consovoy McCarthy PLLC, 1600 Wilson Blvd., Ste. 700

City, State, Zip Code: Arlington, VA 22209

Telephone: (703) 243-9423

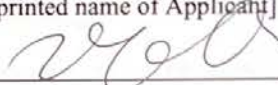
Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Frank H. Chang to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Frank H. Chang

[printed name of Applicant]

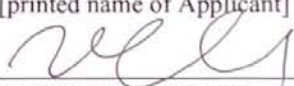
  
[signature of Applicant]

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 4th day of May, 2022.

Frank H. Chang

[printed name of Applicant]

  
[signature of Applicant]

## OTHER BAR ADMISSIONS

<b>Bar</b>	<b>Date of Admission</b>
Pennsylvania	10/27/2017
District of Columbia	09/01/2020
U.S. Court of Appeals for the Fourth Circuit	05/09/2018
U.S. Court of Appeals for the Fifth Circuit	08/07/2019
U.S. Court of Appeals for the Sixth Circuit	10/1/2021
U.S. Court of Appeals for the Eighth Circuit	10/5/2021
U.S. Court of Appeals for the Ninth Circuit	07/02/2020
U.S. Court of Appeals for the Eleventh Circuit	10/6/2021
U.S. Court of Appeals for the D.C. Circuit	12/22/2020
U.S. District Court for the D.C.	05/02/2022